

EXHIBIT GG

Page 1

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

CHARLENE CARTER)
)
) CIVIL ACTION NO.
VS.) 3:17-CV-02278-X
)
SOUTHWEST AIRLINES CO., AND)
TRANSPORT WORKERS UNION OF)
AMERICA, LOCAL 556)

CONFIDENTIAL
TWU LOCAL 556 30(b)(6)
ORAL DEPOSITION OF
JESSICA PARKER
NOVEMBER 30, 2020

ANSWERS AND DEPOSITION OF JESSICA PARKER,
produced as a witness at the instance of the
Plaintiff, taken in the above-styled and -numbered
cause on NOVEMBER 30, 2020, at 4:13 p.m., before
CHARIS M. HENDRICK, a Certified Shorthand Reporter
in and for the State of Texas, witness located in
Loveland, Colorado, pursuant to the Federal Rules
of Civil Procedure, the current emergency order
regarding the COVID-19 State of Disaster, and the
provisions stated on the record or attached hereto.

Page 2

1 A P P E A R A N C E S

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14 FOR THE DEFENDANT, TRANSPORT WORKERS UNION OF
15 AMERICA, LOCAL 556:

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21 ALSO PRESENT: MS. CHARLENE CARTER
22 MS. LAUREN ARMSTRONG

23

24

25

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9 EXHIBITS

10 Exhibit 28 - 12
Union Business Confirmed Travel Request Form,
11 Document 41

12 Exhibit 29 - 17
TWU Women Take Action Nationwide Article,
13 Document 14

14 Exhibit 30 - 30
Facebook Posts TWU Local 556,
15 Documents 25(a) & 25(b)

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1 PROCEEDINGS

2 THE REPORTER: Today's date is
3 November 30, 2020. The time is 4:13 p.m. This is
4 the 30(b)(6) deposition of Jessica Parker, and it
5 is being conducted remotely in accordance with the
6 current emergency order regarding the COVID-19
7 State of Disaster. The witness is located in
8 Laughlin, Colorado.

14 JESSICA PARKER,
15 having been first duly sworn, testified as follows:

16 EXAMINATION

17 BY MR. GILLIAM:

18 Q. Good afternoon, Ms. Parker. Do you
19 realize you are here today testifying on behalf of
20 Local 556 and not in your personal capacity?

21 A. Yes.

22 Q. Okay. And prior to this deposition, did
23 you review any documents in preparation?

24 A. No, I did not.

25 Q. Okay. And apart from legal counsel, did

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1 A. No. Just for the -- just for the -- just
2 for the meeting at TWU International.

3 Q. Okay. Now, prior to the event taking
4 place, did -- did you ask Audrey Stone for
5 authorization to organize the union's participation
6 in the event?

7 A. I don't -- I don't know that I asked for
8 her authorization. We arranged -- there was -- we
9 arranged travel to and from. And I got approval
10 that we could -- because we were facilitating a
11 meeting while we were there, that we could use
12 union business travel. And I -- I got approval for
13 that, but I don't know -- I don't remember anything
14 other than that.

15 Q. Okay. And you got the approval for union
16 business travel from Audrey Stone?

17 A. I don't remember. I don't remember. I
18 think I initially emailed John Parrott and he
19 recommended that we check with Audrey, I believe is
20 how that happened. It's been four years ago, so I
21 don't remember exactly.

22 Q. Okay. And how many union members ended up
23 attending the women's march?

24 A. I -- if memory serves, I believe we had
25 28, but that is -- that is a rough guess. It's a

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1 close guess, but it's --

2 Q. Okay. And did you decide who, I guess,
3 you would invite to attend the march?

4 A. They were women who reached out that had
5 been involved in our union that showed -- that
6 expressed interest in going.

7 Q. Now, of the women who expressed interest
8 in going, how did they learn that Local 556 was
9 going to participate in a women's march?

10 A. I -- I don't recall how that all
11 transpired.

12 Q. Okay. But the union members reached out
13 to you personally or --

14 A. Some of them did, I think, but others were
15 -- I -- I honestly don't remember how -- I -- I
16 knew, of people who were going, there were several
17 board members who went, so I -- I probably found
18 out through some -- through -- through board
19 members.

20 Q. Okay. And how -- do you know how they
21 went about getting authorization to attend?

22 A. Well, there was no authorization to attend
23 -- to attend the march. We had -- we had to
24 arrange lodging. So, I guess, I don't understand
25 what you are asking.

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1 Q. Did -- did the union members who wanted to
2 attend have to, I guess, request to be pulled in
3 order to attend?

4 A. I believe there were a handful of trip
5 pulls. I don't know how many. John Parrott would
6 probably know that exactly because he handles the
7 pulls.

8 Q. Okay. And who -- are there -- are there
9 particular forms that have to be submitted in order
10 to, I guess, to -- to be pulled?

11 A. If memory serves, most people arrange --
12 either already were off of work or arranged to be
13 off of work. I -- I believe I submitted a handful
14 of people to -- I am assuming JP, with their trip,
15 their pairing number and the dates if it needed to
16 be pulled.

17 Q. Okay. And when you say you submitted a
18 handful of people, did you submit particular forms?

19 A. I -- at that time, our -- the way we have
20 done things, I believe, has changed since then. I
21 think I just emailed him names, employee numbers,
22 pairing number and dates.

23 Q. Okay. Let's see. If I could have you
24 look at Document 41. We will mark this as, I
25 guess, Exhibit 28; is that where we are?

Page 22

1 paragraph?

2 Q. It's the one that starts, the WWC meeting
3 started with an all-day intensive how-to-lobby
4 session.

5 A. Yes.

6 Q. Okay. And did the Local 556 members
7 attend that meeting during the week of the women's
8 march?

9 A. I am not sure what this -- because we
10 spoke about the Pregnant Women's Fairness Act at
11 the meeting. Is this -- I don't know if this is
12 referring to --

13 Q. It says, the WWC meeting started with an
14 all-day intensive how-to-lobby session facilitated
15 by WWC chair and TWU political field representative
16 Gwen York.

17 A. Okay. But it talks about -- prior to
18 that, it talks about TWU International's working
19 women's committee meeting held thrice yearly; that
20 -- that was not the -- so I don't know if it's
21 referring to that meeting or if it's referring to
22 the meeting that we had on the 19th. And so --
23 because I haven't read through this entire article,
24 I believe that that is -- that's referring to the
25 -- to the meeting held February 28th through March

Page 28

1 A. That says -- I am sorry, what?

2 Q. Carter 1144.

3 A. I don't -- are we on 25?

4 MR. GREENFIELD: 25-A, Ms. Parker. It
5 will be the second document on the second page on
6 25-A.

7 A. Okay. I am on 25-A and I don't see --

8 Q. (By Mr. Gilliam) Really small letters in
9 the bottom right-hand corner.

10 A. Okay. I --

11 Q. You found it?

12 A. It says Carter 1163?

13 Q. Do you see one that says 1144?

14 A. 1150 -- I think --

15 Q. It should be the second page.

16 A. Okay. Carter 1144. Sorry. It's tiny.

17 Q. No, yeah, yeah, it is very small, so, no.

18 And do you know who [REDACTED] is?

19 A. I do.

20 Q. Okay. And who is she?

21 A. She's a flight attendant and a member of
22 Local 556.

23 Q. Okay. Is she a member of the working
24 women's committee?

25 A. Yes.

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1 Q. Okay. And is she the person carrying the
2 sign in that picture?

3 A. Yes.

4 Q. Okay. And let's see. Going to the next
5 page. And do you recognize any union members in
6 this picture?

7 A. Yes.

8 Q. Okay. And who are the union members you
9 recognize in this picture?

10 A. The far left, I believe, is [REDACTED]
11 [REDACTED]. On the top of [REDACTED] shoulder is
12 Audrey Stone. [REDACTED] is next. I don't know
13 who the male is. And -- but then -- I don't -- I
14 don't know who that is.

15 Q. Okay.

16 A. And then it's [REDACTED] on the far
17 right.

18 Q. Okay. And do you recognize this banner
19 being carried here?

20 A. Yes.

21 Q. Okay. And where did the banner come from?

22 A. I believe we had it made prior to the
23 march.

24 Q. Okay. And let's see. Let me see. If I
25 can direct you to the next page too.

Page 30

1 A. Okay.

2 Q. This one -- this is the one that says
3 Carter 1147 at the bottom?

4 A. Yes.

5 Q. Okay. And this picture here, was this
6 posted on TWU Local 556's page?

7 A. This is -- I believe this may be from the
8 Facebook page, but it -- it may have been also
9 posted on the website. I don't know; I think it
10 was.

11 Q. Okay. And did you share it on your
12 Facebook page?

13 A. I don't remember.

14 Q. Okay. And up at the top, it says, Jessica
15 Parker shared TWU Local 556's video; and it says,
16 why we marched.

17 Does that --

18 A. I didn't remember sharing it. I didn't
19 remember sharing it.

20 Q. Okay. And then if we could go to the next
21 page.

22 A. Okay.

23 Q. And was this a -- also a picture you
24 posted on your Facebook page?

25 A. Yes. It looks like it.

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1 Q. Okay. And all of the women pictured
2 there, are they Local 556 members?

3 A. Yes.

4 Q. Okay. All right. And do you know who
5 [REDACTED] is?

6 A. Yes. [REDACTED]

7 Q. Okay. And is she also a Southwest flight
8 attendant?

9 A. At the time, she was. She's retired.

10 Q. Okay. Was she also a member of the WISE
11 committee?

12 A. Yes.

13 Q. Okay. And she attended the march?

14 A. She did, yes.

15 Q. Okay. Do you know who [REDACTED] is?

16 A. Yes.

17 Q. Okay. Is she also a flight attendant?

18 A. She is, yes.

19 Q. Okay. And did she also attend the women's
20 march with Local 556?

21 A. She did, yes.

22 Q. Okay. All right. Now, at any point, did
23 you learn about the Facebook posts and messages
24 that Charlene Carter sent to Audrey Stone?

25 A. I knew something had been sent to Audrey

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1 I, JESSICA PARKER, have read the foregoing
2 deposition and hereby affix my signature that same
3 is true and correct, except as noted above.

4

5

6 JESSICA PARKER

7

8 THE STATE OF _____
9 COUNTY OF _____

10 Before me, _____, on this day
11 personally appeared JESSICA PARKER, known to me (or
12 proved to me under oath or through _____) to
be the person whose name is subscribed to the
foregoing instrument and acknowledged to me that
they executed the same for the purposes and
consideration therein expressed.

13

14 Given under my hand and seal of office this _____
15 day of _____, 2020.

16

17 _____
18 NOTARY PUBLIC IN AND FOR THE
19 STATE OF _____

20 MY COMMISSION EXPIRES: _____

21

22

23

24

25

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1 REPORTER'S CERTIFICATION

2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE NORTHERN DISTRICT OF TEXAS
4 DALLAS DIVISION

5 CHARLENE CARTER)
6 VS.)
7 SOUTHWEST AIRLINES CO., AND)
8 TRANSPORT WORKERS UNION OF)
9 AMERICA, LOCAL 556)

10 CONFIDENTIAL
11 TWU LOCAL 556 30(b)(6)
12 ORAL DEPOSITION OF
13 JESSICA PARKER
14 NOVEMBER 30, 2020

15 I, CHARIS M. HENDRICK, Certified Shorthand
16 Reporter in and for the State of Texas, do hereby
17 certify to the following:

18 That the witness, JESSICA PARKER, was by
19 me duly sworn and that the transcript of the oral
20 deposition is a true record of the testimony given
21 by the witness.

22 I further certify that pursuant to Federal
23 Rules of Civil Procedure, Rule 30(e)(1)(A) and (B)
24 as well as Rule 30(e)(2), that review of the
25 transcript and signature of the deponent:

Page 40

1 xx was requested by the deponent and/or a
2 party before completion of the deposition.

3 _____ was not requested by the deponent and/or
4 a party before the completion of the deposition.

5 I further certify that I am neither
6 attorney nor counsel for, nor related to or
7 employed by any of the parties to the action in
8 which this deposition is taken and further that I
9 am not a relative or employee of any attorney of
10 record in this cause, nor am I financially or
11 otherwise interested in the outcome of the action.

12 The amount of time used by each party at
13 the deposition is as follows:

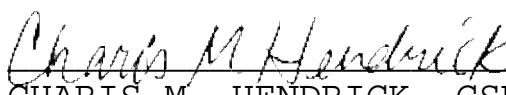
14 Mr. Gilliam - 50 minutes

15

16 Subscribed and sworn to on this 8th day of
17 December, 2020.

18

19

20 
CHARIS M. HENDRICK, CSR # 3469
21 Certification Expires: 10-31-21
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